

FILED
CLERK

March 15, 2023

BTK
F. #2023R00203

U.S. DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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MJ 23-0235

UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 2252(a)(2))

CHRISTIAN BRAZOBAN,

Defendant.

-----X

EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH E. TESTA, being duly sworn, deposes and states that he is a Task Force Officer with the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about March 3, 2023, within the Eastern District of New York and elsewhere, the defendant CHRISTIAN BRAZOBAN did knowingly and intentionally distribute one or more visual depictions using a means and facility of interstate and foreign commerce, which visual depictions had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(2))

The source of your deponent's information and the grounds for his/her belief are as follows:¹

1. I am a Task Force Officer with the United States Department of Homeland Security, Homeland Security Investigations ("HSI") and have been involved in the investigation of numerous cases involving the sexual exploitation of children. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file; and from reports of other law enforcement officers involved in the investigation.

2. This morning, March 15, 2023, myself and other HSI agents executed a Search Warrant (Dkt. No. 23-Mag.-2091) (the "Search Warrant") that was issued by the Honorable Katharine H. Parker, United States Magistrate Judge (S.D.N.Y.), for the defendant's, CHRISTIAN BRAZOBAN's, residence in the Bronx, New York. Following execution of the Search Warrant, the defendant waived his Miranda rights and admitted, in substance, to distributing images of child pornography—which are described further below and are available for the Court's review—to a Minor Victim ("Minor Victim-1"), a resident of Nassau County, New York, whose identity is known to the United States Attorney. In connection with the execution of the Search Warrant, HSI agents conducted a preliminary review of the defendant's cellular telephone, which revealed text messages that the defendant sent to Minor Victim-1 that contained images of child pornography, some of which are described further below.

3. Before execution of the Search Warrant an investigation revealed that, on March 3, 2023, the defendant CHRISTIAN BRAZOBAN—who had engaged in numerous

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

video-chats with Minor Victim-1 between approximately March 2021 and March 2023—had used an Google email account (the “Gmail Account”), the address of which contained his first and last names, to send the following images of child pornography to Minor Victim-1 at a location in Nassau County, New York:²

- a. Filename IMG_0064.heic, which depicted a three-picture collage of a prepubescent female, 6-to-10 years of age, wearing a pink striped shirt with yellow underwear, polka dots and puppy images on them in all three pictures. In the first picture on the left, the prepubescent female is on her knees, looking forward at the camera perspective, body slightly turned to the left, with an adult male penis being held in front of her face. The second picture in the collage depicts the same prepubescent female on her knees, facing forward, looking at the camera and holding an adult male penis in her hand. The third picture in the collage again shows the same prepubescent female lying on her back, arms above her head, with an adult male penis being pressed up against her vaginal area, over her underwear.
- b. File name, IMG_0065.heic, which depicted a two-picture collage of a prepubescent female, between the ages of 7 and 11. In the picture on the left, the child is fully clothed, wearing a brown animal faced suspender skirt with a white top with flower print. In the picture on the right, the child is on a bed with a purple sheet, on her hands and knees with her skirt up, underwear down to the back of her thighs, fully exposing her vagina and anus.

² During his Mirandized statement, the defendant admitted, in substance, that he used the Gmail Account to communicate with Minor Victim-1.

- c. File name, IMG_0067.heic, which depicted a prepubescent female between the ages of 3-and-7, lying on her back, with her hands to her face, legs up to her chest, exposing her vagina and anus with what appears to be a white substance, appearing to be semen, around her anus.

4. In addition to the above images, the investigation further revealed that, on March 3, 2023, the defendant CHRISTIAN BRAZOBAN used the Gmail Account to send Minor Victim-1 the video file name, RecordIt-7633F358-427F-4790-8C98-19A16DCFD7E8.mov, which included approximately forty-five images depicting child sexual abuse and minors engaging in lewd and lascivious acts. Among other images, this video depicted a prepubescent female, between the ages of 7-and-10, wearing glasses and white-and-pink top, laying on her back, legs spread, fully exposing her vagina and anus and an image depicting a prepubescent female between the ages of 3-and-6, in a room with green carpeting, unclothed from the waist down, straddling an adult male that is seated in a chair and being penetrated by that adult male's penis.

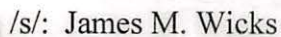
5. In response to Minor Victim-1 objecting to the defendant CHRISTIAN BRAZOBAN sending Minor Victim-1 the images and videos of child pornography that are described above to a location in Nassau County, on or about March 3, 2023, the defendant sent Minor Victim-1 text messages, which were also received in Nassau County, stating, in substance, ““POW,” “lil girl shot dead on Long Island,” and “I can see the headlines now,” “Ima be in your neighborhood all summer,” “I’m serious,” “I’m thinkin I tie you and just beat you to death with a mallet,” and “[I] might even f**k your dead body.” In addition, the defendant sent Minor Victim-1 a voice message, stating, in substance, “N***a if you really think I’m a good person n***a you stupid, you gonna fuck around and die thinking n***as is nice.” Also on March 3,

2023, an Instagram Account bearing a profile picture that depicted the defendant left a voice message for Minor Victim-2, a relative of Minor Victim-1, whose identity is known to the United States Attorney, stating, in substance, "little girls need to stop playing. This is not a game. I'll really go over there. I'll kill the police, kill you, your family, your bald daddy, grandmother, your grandfather and the dog at your grandfather's house, I know everything about you." After waiving his Miranda rights, the defendant admitted, in substance, that he sent the above-described text messages and voice messages to Minor Victim-1 and Minor Victim-2.

WHEREFORE, your deponent respectfully requests that the defendant CHRISTIAN BRAZOBAN, be dealt with according to law.


JOSEPH E. TESTA
Task Force Officer, United States Department of
Homeland Security, Homeland Security
Investigations

Sworn to before me this
15th day of March, 2023


/s/: James M. Wicks

THE HONORABLE JAMES M. WICKS
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK